

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

CONTINQUE WILLCOT,)	
)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 24-cv-00317-DC-RCG
)	
)	
SECURITIES AND EXCHANGE)	
COMMISSION, et al.)	
)	
)	
Defendants.)	
)	

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO THE AMENDED
COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Securities and Exchange Commission (“SEC” or “Commission”) requests a 30-day extension of time to May 12, 2025¹ to respond to Plaintiff’s Amended Complaint (ECF 3).

In support of this motion, the Commission states as follows:

1. This motion is the Commission’s first request for an extension of time with respect to this time limitation.
2. Counsel for the Commission has conferred with pro se Plaintiff, and he consented to the requested extension of the deadline to respond to the Amended Complaint. No other party has made an appearance at this time.
3. The Commission requests the additional time to prepare its response to the

¹ Plaintiff served the United States Attorney’s Office for the Western District of Texas on February 10, 2025. Therefore, pursuant to FRCP Rule 12(a)(2), the Commission’s response would be due April 11, 2025 absent an extension.

Amended Complaint because of its breadth. The Amended Complaint is 78 pages with 285 numbered allegations and contains many unnumbered allegations. The Amended Complaint further has 8 counts and seeks declaratory relief on a variety of statutory and constitutional bases.

WHEREFORE, the Commission respectfully moves for an extension of time from April 11, 2025, to and including May 12, 2025, to move to dismiss or otherwise respond to the Amended Complaint.

Respectfully Submitted,

Date: March 4, 2025

/s/ Eric A. Reicher

Melinda Hardy*
D.C. Bar No. 431906
Eric A. Reicher**
D.C. Bar No. 490866
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549
(202) 551-7921 (phone) (Reicher)
(202) 772-9263 (facsimile)
hardym@sec.gov
reichere@sec.gov

Jason J. Rose
Texas Bar No. 24007946
Securities and Exchange Commission
801 Cherry Street, Suite 1900
Fort Worth, Texas 76102
(817) 978-1408 (phone)
(817) 978-4927 (facsimile)
rosej@sec.gov

Counsel for the SEC

* Pro Hac Vice Forthcoming
** Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2025, I filed or caused to be filed the foregoing through the CM/ECF system which will provide service to counsels of record and I will provide a copy to Plaintiff if he does not receive notice through the CM/ECF system.

/s/ Eric A. Reicher

Eric A. Reicher
Special Trial Counsel
U.S. Securities and Exchange Commission